

Guidance notes for Feed Mills on the Manufacture, Labelling and Use of Feeds for Organic Farming

Organic requirements are in addition to other statutory requirements

Statutory information is for guidance only and is correct at time of going to print

Please refer to the OF&G Control Manual for full details of legislation and interpretation and to the OF&G Technical Newsletters, published every 2 months, for legislation updates

CERTIFICATION

Mills producing feed for organic farms must be registered with one of the Defra-approved organic certification bodies, such as OF&G.

INGREDIENTS

Approved Non-Organic Feed: Organic livestock should be fed only organically-produced feedstuffs, however, because these have been in short supply, there has been a derogation to allow the use of some non-organic, non-GM feedstuffs where their use can be justified. (Details are given below and in Section 8.4 of the OF&G Control Manual.)

PERCENTAGE OF NON-ORGANIC FEED ALLOWED FROM 25th AUGUST 2005

For herbivores/ruminants:

Feed must be 100% organic from 01/01/08

For pigs and poultry (and other non-ruminant species):

A maximum of 10% non-organic feed from 1/1/08 until 31/12/09.

A maximum of 5% non-organic feed from 1/1/10 until 31/12/11.

After this time, feed should be 100% organic

These percentages are to be calculated on an annual dry matter basis of ingredients from agricultural origin. The maximum daily non-organic allowance is 25% dry matter.

Please note: The information above is now Statutory Law. The information below is Defra Guidance and may be subject to amendment. We will keep you updated.

Feed Records detailing the type and amounts of all feeds used must be kept by the farmer. Remember, only ingredients listed in Section 8.4 of the OF&G Control Manual may be used as the non-organic portion of the feed and only the non-organic feedstuffs on the Green List (see below) can be used (by farmers) without a derogation from OF&G.

PERMITTED NON-ORGANIC INGREDIENTS

Defra has made it clear that fully organic feed should be used wherever possible and that the derogation (above) allows non-organic feed to be used only where organic feed is not available.

However, Defra accepts that organic forms of the feedstuffs listed below, (the 'Green List') are not currently available in sufficient quantities. These are mainly primary protein sources. If farmers need to use these feedstuffs, they may do so, within the limits listed above, without applying to their Certification Body for a derogation. However farmers must create and maintain a 'Non-Organic Feed Justification Record' using OF&G Record Sheet RS25. This is a record of the reasons for using a non-organic feed and the efforts that have been made to obtain organic feeds.

A copy of all Non-Organic Feed Justification Records (RS25) must be available to the Inspector at each inspection and will be returned to the certification office for assessment.

Where farmers wish to use a non-organic feedstuff that is not on the Green List but is on the permitted list (see Section 8.4 of the OF&G Standards), they must first apply to OF&G, with written justification and must have a derogation approved in writing before buying the feed. OF&G Record Sheet RS26 'Non-Organic Feed Derogation Application Form' must be used for this purpose. (Note: Defra does not expect there to be many of these applications because there are sufficient organic sources of these feedstuffs.) All requests for non-organic feeds not on the green list, whether approved or not, will be referred to Defra so that they can monitor the situation.

The Green List - Non-organic ingredients that can be used

| | |
|---|--------------------------------------|
| Protein sources | |
| Maize gluten meal (Prairie Meal) | Egg and egg products |
| Potato Protein | Wheat middlings (Wheat Feed) |
| Brewers' grains | Rape seed expeller |
| Fish and other marine animals and their by-products | |
| Others | |
| Sugar beet pulp | Molasses |
| Powders and extracts of plants | Seaweed meal |
| Spices and herbs | Vegetable oils (physical extraction) |
| Milk and milk products (non-organic milk replacer) | |

Defra states that some of the feedstuffs on the list above, are available organically in the UK, but so far only in small quantities. However Defra requires justification for use of these feedstuffs in non-organic form, because it wants to ensure that these producers can sell their organic protein sources and that this will stimulate the market so that others will start producing them too.

This Green List will be reviewed regularly and items will be removed from the list as soon as organic sources become available in sufficient quantity. We will keep you updated via our Technical Newsletters.

WHO HAS TO APPLY FOR A DEROGATION?

Straights: Where farmers are buying in non-organic straights or making up their own feed, they will have to apply for a derogation to use any ingredients that are not on the Green List above.

Compound feeds: Where farmers are buying in part-organic compound feeds (eg for pigs and poultry), Defra requires that the Feed Compounder applies for the derogation from their certification body and supplies a copy of the feed label to farmers buying the compound feed. The farmer must attach a copy of the feed label to their Non-Organic Feed Justification Record R25.

Animal Feed Processors using non-organic feeds intended for sale from 25/8/05 must obtain a derogation from OF&G for these (Use Record Sheet 26 from Section 6 of the Control Manual) and supply the farmer with a copy of the feed label. This applies to all non-organic feed materials whether or not they are on the Green List unless previously packed/purchased (see below).

FEED ALREADY PURCHASED / PACKED

Since the EU decision on the reduction in the non-organic feed allowance has been so long delayed, OF&G will give some leeway for feeds already packed or purchased.

For feed already on farm, or ordered or manufactured before 31/7/05, no derogations will be required. However farmers must keep a record of any non-organic feedstuffs that have been used and justify their use. OF&G expects these feeds to have been used by 31/10/05 and will require an application for a derogation for any non-organic feedstuffs, used after this date, if they are not on the Green List.

These new requirements will take effect from 25/8/05 and have been incorporated into the new OF&G Control Manual. Please contact your Certification Officer if you have any queries.

GREEN LIST, TECHNICAL LEAFLETS AND RECORD SHEETS

Any amendments to the Green List will be published in our 2-monthly Technical Newsletter. Please make sure you read it!

All OF&G Record Sheets and Technical Leaflets can be obtained from the OF&G Certification Office or downloaded from our website.

COMMENTS FROM THE FEED INDUSTRY

We understand that the feed industry supports the move to 100% but recommends that the derogations are used where necessary. If all farmers demand 100% organic feed for their livestock immediately, there are likely to be supply shortages which may lead to big price increases, that could in turn disadvantage organics.

For example, an 85% organic compound dairy feed when used together with 100% organic forage can give a total organic feed intake in excess of 95%.

Genetically Modified Ingredients: Genetically modified organisms or materials derived from them are not permitted in organic farming. All OF&G-registered feed mills will be required to sign a statement that they “will take all reasonable precautions and exert all due diligence to ensure that approved feeds are free of GMOs and their derivatives.” Farmers buying non-approved feeds (eg for animals that will shortly be converted to organic) must request a similar statement from their Feed Supplier.

However feed can no longer be labelled as ‘GM-free’ or ‘Non-GM’. The law has changed and feeds can now only refer to GMOs if they contain them. So we can no longer request that feed labels carry a non-gm statement.

The following information has not been affected by the recent change in the feed derogation.

Prohibited Materials: Feed used for organic livestock must not contain the following:-

- Materials produced with the use of genetically modified organisms or products derived from them
- Feedstuffs that have been solvent extracted or to which chemicals have been added
- Synthetic amino acids or amino acid isolates
- Urea and other synthetic nitrogen compounds
- Synthetic growth promoters or stimulants
- Synthetic appetisers/flavourings
- Preservatives (other than those listed in Section 8.4 of the Control Manual)
- Artificial colouring agents
- All types of excrement including droppings, dung, manure
- Farm animal by-products (eg abattoir waste)
- Ingredients that have been subject to ionising radiation
- Medicated ingredients (except under Veterinary prescription and with derogation)
- Non-food ingredients and fillers
- Fats and oils used to produce high energy diets for quick maturing or high levels of production

Additional Specific Requirements for Ruminant Feeds:

Synthetic vitamins A, D and E are only permitted on an as-needed basis and must have a derogation from OF&G. (Feeds containing these vitamins must be labelled “Restricted “ as detailed in Example 3 below.)

Additional Specific Requirements for Non-Ruminant Feeds:

Roughage, fresh or dried fodder or silage must be added to the daily ration for housed pigs and poultry.

NOTE: The requirement that at least 65% of the feed for table birds be made up of cereals has now been deleted.

OPERATIONAL REQUIREMENTS

Statutory Requirements: All relevant statutory requirements and codes of practice should be complied with. The organic regulations are in addition to these. (CM sect:11)

Ingredients: Only ingredients listed in Section 8.4 of the OF&G Control Manual may be used.

Organic ingredients may only be sourced from suppliers providing proof of organic certification. This is normally in the form of a certificate that lists the products certified and is issued by one of the EU-approved organic certification bodies.

Segregation: Organic ingredients must be kept separate from non-approved ingredients during transport, intake, storage, processing and packing. Segregation may be achieved by using dedicated equipment, cleardowns between batches or by flushing through with an approved material.

The mill is expected to have written procedures to ensure segregation (especially from GM or medicated ingredients) and checklists to prove that the procedures have been followed. (CM Sect:11)

Prevention of chemical contamination: Where cleaning chemicals or pest control chemicals are used, procedures must ensure there is no possibility of them contaminating the feed. Spraying or fogging chemicals in areas where organic feed or packaging may be affected, is not allowed. (CM Sect:11)

Mass Balance (Reconciliation of inputs and outputs): Stock control and purchase/sales records should enable a comparison of quantities of organic ingredients bought in with quantities of finished product made. This is called a mass balance and is checked during the annual inspection. (CM Sect:11)

Training: There should be records to show that all relevant staff have been trained to understand the organic requirements and comply with them. (CM Sect:11)

LABELLING

OF&G labelling requirements are summarised below but are also detailed in CM Sect:4

Ingredient Declaration: The labels of all animal feed products must list all the ingredients, including additives, in descending order (by weight). Any ingredients that are organic or in-conversion must be clearly identified. In-conversion ingredients must not be identified as organic. (CM Sect:4.3)

The following types of feed are used in organic farming

- Approved non-organic
- Approved organic or partially organic
- Restricted (eg ruminant feeds containing synthetic vitamins). These require a derogation from the farmer's certification body.

IMPORTANT: It is the farmer's responsibility to make sure his/her livestock are fed according to OF&G Organic Standards and obtain derogations where relevant. It is the feed mill's responsibility to label the feeds clearly and correctly. (For bulk feeds, a label should be attached to the delivery note.) Examples of labels for different types of feed are given on pages 4 and 5 of this leaflet.

Use of the statement "Organic Certification UK2": OF&G-Registered Feed Suppliers must use the statement "Organic Certification UK2" on the labels of all certified animal feeds (excepting pet foods) which are to be fed to stock under organic management, (this includes fully organic stock, converted breeding stock and stock under simultaneous conversion). This statement identifies OF&G as the responsible certification body and confirms that the feed has been produced to Defra Organic Standards. (CM Sect:4.3)

Use of the OF&G logo: OF&G-Registered Feed Suppliers are entitled to use the OF&G logo on approved product labels and appropriate publicity materials. This is not a requirement but may be useful as a marketing aid (and includes the statement “Organic Certification UK2”)

LABELLING FEEDS CONTAINING BOTH ORGANIC and IN-CONVERSION INGREDIENTS

There has been confusion about how to label feeds containing both organic and in-conversion ingredients. The OF&G Certification Committee has now approved an alternative format for these labels. The original format (CM Sect:4.3) is

X% Organic (Y% In-Conversion) Feed Name

Followed by the statement:-

“X% of the ingredients have been organically produced and Y% as in-conversion to organic production in accordance with Defra Organic Standards.”

The alternative format is:-

Z% OF&G Cert

Followed by the statement:-

“X% of the ingredients have been organically produced and Y% as in-conversion to organic production in accordance with Defra Organic Standards.”

Where Z% is the **sum** of the percentages of the agricultural ingredients from both organic **and** in-conversion production.

e.g. If the agricultural ingredients of a poultry feed are 70% organic, 20% in-conversion and 10% non-organic, the feed may be labelled

70% Organic (20% In-Conversion) Poultry Feed or 90% OF&G Cert Poultry Feed

followed by the statement

70% of the ingredients have been organically produced and 20% as in-conversion to organic production in accordance with Defra Organic Standards

USE OF ORGANIC, IN-CONVERSION and NON-ORGANIC INGREDIENTS IN THE SAME FEED

Products may not include the same agricultural ingredient in both non-organic and organic or in-conversion forms. (Control Manual Sect:4.3)

Note 1: In-conversion products must have been grown under Defra Organic Standards for at least 12 months before harvest and be listed on the Producer’s Organic Certificate.

Note 2: Agricultural ingredients include cereals, pulses, oils, fishmeal etc but exclude water, salt, minerals, enzymes, micro-organisms and synthetic vitamins. (CM Sect:10)

Clarification (using wheat as an example)

- √ Organic and in-conversion wheat may be included in the same feed.
- X Non-organic and organic wheat may not be included in the same feed.
- X Non-organic and in-conversion wheat may not be included in the same feed.

LABELS FOR APPROVED NON-ORGANIC FEEDS

These are feeds that don't contain organic or in-conversion ingredients but are approved for use in organic farming because all the ingredients they contain are approved by OF&G.

No genetically modified or medicated ingredients may be included.

Example 1 – Label for an Approved Non-Organic Feed

Ticket No: 12345 Wt: 25kg
J.Bloggs Ltd, Farm Lane, Derby DE4 6PQ

APPROVED NON-ORGANIC DAIRY 18% NUTS

A complementary feed for dairy cows.

Ingredients (in descending order by weight)

Wheat, Rape Seed Expeller, Maize Gluten (Prairie Meal), Beet Molasses, Calcium Carbonate,
Sodium Chloride, Magnesium Oxide

Store in a cool dry place

| | | | | | |
|-----|----|----------|-----|-----------|----|
| Oil | x% | Protein | 18% | Fibre | x% |
| Ash | x% | Moisture | x% | Magnesium | x% |

Feed approved for use in Organic Farming only when fed according to Defra Organic Standards

Organic Certification UK2

LABELS FOR RESTRICTED FEED

These are ruminant feeds containing synthetic vitamins. Justification must be provided by the farmer's animal health plan and a derogation from his/her Certification Body before use. The remaining ingredients are from the list of OF&G approved or organic / in-conversion ingredients. No genetically modified or medicated ingredients may be included.

Example 2 – Label for Restricted Feed containing Synthetic Vitamins

Ticket No: 12345 Wt: 25kg
J.Bloggs Ltd, Farm Lane, Derby DE4 6PQ

RESTRICTED 100% ORGANIC BEEF NUTS

A complementary feed for beef cattle to be fed with organic or in-conversion forage and other feeds.

Ingredients (in descending order by weight)

Organic Wheat, Organic Soya Expeller, Organic Peas, Limestone, Organic Lucerne,
Monocalcium phosphate, Vitamin and Mineral Premix, Sodium bicarbonate, Salt

Store in a cool dry place

Declaration of Analysis

| | | | | | | | |
|-----------|---------------------------|---------|----|-------|-----------|----------|----|
| Oil | x% | Protein | x% | Fibre | x% | Ash | x% |
| Vitamin A | 10,000 iu/kg (as retinol) | | | | Vitamin E | 20 iu/kg | |

CONTAINS RESTRICTED VITAMINS - CERTIFICATION BODY APPROVAL MUST BE OBTAINED BEFORE USE
100% of the ingredients have been organically produced in accordance with Defra Organic Standards

Organic Certification UK2

This feed is approved for use in Organic Farming only when fed according to Defra Organic Standards and with a derogation from your Organic Certification Body.

LABELS FOR APPROVED ORGANIC or ORGANIC / IN-CONVERSION FEEDS

These are feeds that contain some organic and/or in-conversion ingredients. The remaining ingredients are from the list of OF&G approved ingredients. No genetically modified or medicated ingredients may be included.

Example 3 – Label for Feed containing Organic and/or In-conversion Ingredients

| | | | | | | | | | | | | |
|--|-----|----------|---------|-----------|-------|----|-----|----|----------|----|-----------|----|
| Ticket No: 12345 Wt: 25kg J.Bloggs Ltd, Farm Lane, Derby DE4 6PQ 40% ORGANIC (30% IN-CONVERSION) DAIRY 18% NUTS or 70% OF&G CERT DAIRY 18% NUTS A complementary feed for dairy cows to be fed with organic or in-conversion forage and other feeds. <u>Ingredients (in descending order by weight)</u> Organic Wheat, In-conversion Oats, Distillers Dried Grains, Rape Seed Expeller, Maize Gluten (Prairie Meal), Beet Molasses, Calcium Carbonate, Sodium Chloride, Magnesium Oxide Store in a cool dry place <table style="margin-left: auto; margin-right: auto;"> <tr> <td>Oil</td><td>x%</td><td>Protein</td><td>18%</td><td>Fibre</td><td>x%</td> </tr> <tr> <td>Ash</td><td>x%</td><td>Moisture</td><td>x%</td><td>Magnesium</td><td>x%</td> </tr> </table> 40% of the ingredients have been organically produced and 30% as in-conversion to organic production in accordance with Defra Organic Standards. Organic Certification UK2 | Oil | x% | Protein | 18% | Fibre | x% | Ash | x% | Moisture | x% | Magnesium | x% |
| Oil | x% | Protein | 18% | Fibre | x% | | | | | | | |
| Ash | x% | Moisture | x% | Magnesium | x% | | | | | | | |

Feed Formulation for Example 3 (above)

| Ingredient | Agricultural or Non-Agricultural | Organic Status | Weight in batch (kg) | % (of Agricultural Ingredients) |
|---|----------------------------------|----------------|----------------------|---------------------------------|
| Organic Wheat | Agricultural | Organic | 1914.0 | 40.0 |
| In-conversion Oats | Agricultural | In-conversion | 1459.4 | 30.5 |
| Distillers Grains | Agricultural | Non-organic | 574.2 | 12.0 |
| Rape Seed Expeller | Agricultural | Non-organic | 382.8 | 8.0 |
| Prairie Meal | Agricultural | Non-organic | 239.3 | 5.0 |
| Cane Molasses | Agricultural | Non-organic | 215.3 | 4.5 |
| Total Wt/% of Agricultural Ingredients | | | 4785.0 | 100.0 |
| Mineral Pre-mix | Non-agricultural | N/a | 215.0 | N/a |
| Total | | | 5000.0 | N/a |

Please contact your Certification Officer if you have any questions.

Contact details are given below.

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